

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK

-----X Civ.
JENNYS E. PAYARES,

Plaintiff,

NOTICE OF REMOVAL

- against -

RYDER TRUCK RENTAL, INC., and ROLAND JONG,
KEJU,

Defendants.

-----X

REMOVAL PETITION

To the Honorable Judges of the United States District Court for the Eastern District of New York, the defendants, RYDER TRUCK RENTAL, INC. and ROLAND JONG KEJU, by their attorneys, Connors & Connors, P.C., state the following upon information and belief:

1. That, RYDER TRUCK RENTAL, INC., is a defendant in the above-entitled action.

2. That, ROLAND JONG KEJU is a defendant in the above-entitled action.

3. That on August 13, 2021, this action was commenced against, RYDER TRUCK RENTAL, INC. and ROLAND JONG KEJU, in the Supreme Court of the State of New York, Nassau County, and is now pending.

The action is captioned:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X Index No. 610426/2021

JENNYS E. PAYARES,

Plaintiff,

- against -

RYDER TRUCK RENTAL, INC., and ROLAND JONG,
KEJU,

Defendants.

-----X

4. A copy of the Summons and Complaint received by, RYDER TRUCK RENTAL, INC. (hereinafter referred to as RYDER) and ROLAND JONG KEJU, is annexed hereto as **Exhibit A**.

5. In essence, the plaintiff alleges that RYDER owned a truck being operated by defendant ROLAND JONG KEJU which collided with plaintiff's vehicle on or about September 10, 2019.

6. A copy of the Verified Answer filed by RYDER and ROLAND JONG KEJU is annexed hereto as **Exhibit B**.

7. In its Answer RYDER admitted that it owned the truck referred to in the Complaint but denied all allegations of negligence.

8. On February 22, 2022, defendants RYDER and ROLAND JONG KEJU served a Demand for Statement of Damages on the plaintiff requesting that the plaintiff provide a response to the demand.

9. The plaintiff responded to defendants' Demand for Statement of Damages on March 30, 2022 claiming damages in the sum of \$1,000,000.00. Attached as **Exhibit C** is plaintiff's response to Demand for Statement of Damages.

10. That defendants are filing this Notice of Removal within 30 days of plaintiff's responding in writing that the plaintiff's claim allegedly has a value in excess of \$75,000.00.

11. No further proceedings have been had in the Supreme Court of the State of New York, Nassau County.

12. At the time the complaint was filed, RYDER was a Foreign Business corporation organized and existing under the laws of the State of Florida.

13. At the time the complaint was filed defendant, ROLAND JONG KEJU was a resident of the State of Nebraska.

14. At the time the complaint was filed plaintiff JENNYS E. PAYARES was a resident of the State of New York.

15. This is an action for damages for personal injury resulting from the alleged negligence of the defendants.


16. This Honorable Court has original jurisdiction over this action pursuant to 28 U.S.C. §1332 and the action may therefore be removed to this Honorable Court pursuant to 28 U.S.C. §1441.

WHEREFORE, defendants, RYDER TRUCK RENTAL, INC. and ROLAND JONG KEJU, pray that the above-entitled action now pending against them in the Supreme Court of the State of New York, County of Nassau, be removed to this Honorable Court.

Dated: Staten Island, New York
April 26, 2022

Yours etc.,

CONNORS & CONNORS, P.C.

By: 
ROBERT J. PFUHLER (1964)
Attorneys for Defendant
766 Castleton Avenue
Staten Island, NY 10310
(718) 442-1700
Our File No. DRT 27583

TO: PANETTA AMINOV, PC
Attorneys for Plaintiff
670 Main Street
Islip, NY 11751
(631) 446-4411

CERTIFICATE OF SERVICE

I, ROBERT J. PFUHLER, hereby certify that a copy of the foregoing, **NOTICE OF REMOVAL**, was mailed by first class mail, postage prepaid, this 26th day of April, 2022 to all counsel of record as indicated below.



ROBERT J. PFUHLER (1964)

TO: PANETTA AMINOV, PC
Attorneys for Plaintiff
670 Main Street
Islip, NY 11751
(631) 446-4411

Civ # Hon.
UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK

JENNYS E. PAYARES,
Plaintiff,
-against-

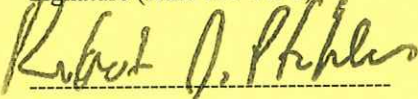
RYDER TRUCK RENTAL, INC., and ROLAND JONG
KEJU,
Defendants.

NOTICE OF REMOVAL

CONNORS & CONNORS, P.C.
Attorneys for DEFENDANTS
Office and Post Office Address, Telephone
766 Castleton Avenue
Staten Island, New York 10310
(718) 442-1700 PHONE
(718) 442-1717 FAX

To

Signature (Rule 130-1.1-a)


ROBERT J. PFUHLER

Attorney(s) for

Service of a copy of the within

is hereby admitted,

Dated,

Attorney(s) for

Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that an order
settlement to the HON.
of the within named court, at
on

of which the within is a true copy will be presented for
one of the judges

at

Dated,

Yours, etc.

CONNORS & CONNORS, P.C.

Attorneys for

Office and Post Office Address

766 CASTLETON AVENUE

STATEN ISLAND, NEW YORK 10310

Attorney(s) for